

RE PURDUE PHARMA  
NO: 19-23649-rdd

8/9/21

DEAR CLERK GENNA,

PLEASE FIND ENCLOSED FOR THE COURTS ATTENTION INMM M  
IN THE HEARING ON MY MOTION MMM SCHEDULED FOR AUGUST 16, 2021 at  
10 AM.

THANK YOU

LAWRENCE HIGGINS



U.S. DISTRICT COURT  
2021 AUG 16 PM 3:18  
S.D. OF N.Y.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: PURDUE PHARMA L.P.

CASE NO. 19-23649-Pdd

CHAPTER 11

BRIEF IN SUPPORT OF MOTION TO FILE LATE CLAIM

U.S. BANKRUPTCY COURT  
2021 AUG 16 P 18  
S.D. OF N.Y.

AND NOW COMES THE PLAINTIFF/CLAIMANT, LAWRENCE HIGGINS, AND  
HEREBY NOTICES THE COURT THAT HE IS INCARCERATED AND CANNOT APPEAR  
BY ANY MEANS TO THE SCHEDULED HEARING OF AUGUST 16, 2021, 10:00AM  
FOR HIS PENDING MOTION FOR LEAVE TO FILE A LATE CLAIM AND WOULD  
SHOW THE COURT THE FOLLOWING IN ADDITION TO HIS PREVIOUSLY  
FILED DOCUMENTS IN THE CAUSE THAT:

- A) CLAIMANT IS IN THE PROCESS OF OBTAINING MULTIPLE PROOFS OF  
LEGAL PRESCRIPTION OF THE DEBTORS PRODUCTS.
- B) CLAIMANT HAS BEEN INCARCERATED IN TEXAS FOR SEVERAL YEARS  
AND EVEN DURING THIS INCARCERATION HE WAS PRESCRIBED DEBTORS  
PRODUCTS.
- C) CLAIMANT FILED INQUIRY FOR INFORMATION FOR PROOF OF CLAIM  
PRIOR TO THE BAR DATE BUT WAS DELAYED THROUGH PRISON MAIL SYSTEM.

ARGUMENT

CLAIMANT IS A LAYMAN OF THE LAW BUT ASKS THIS COURT TO FOLLOW THE  
COURT IN HUNT 146 BR 178 WHO FOUND THAT CREDITORS CLAIM CAN BE  
BARRED FOR FAILURE TO FILE PROOF OF CLAIM PRIOR TO BAR DATE ONLY  
IF CREDITOR RECEIVED REASONABLE NOTICE OF BAR DATE.

PARTIES WHO HAVE FAILED TO FILE PROOF OF CLAIM IN CHAPTER 11  
PROCEEDINGS HAVE BURDEN TO PROVE EXCUSABLE NEGLIGENCE OR CAUSE TO  
AVOID PRECLUSION OF THEIR CLAIMS. FED. RULES 9006(b).

CLAIMANT HAS PROVIDED SWORN AFFIDAVITS HE HAD NO ACCESS TO TELEVISION NEWS PAPERS, LIBRARY AND HAD NO COMMUNICATION WITH THE OUTSIDE WORLD FOR MONTHS PRIOR TO THE BAR DATE BECAUSE ALL TEXAS PRISONS WERE IN TOTAL LOCKDOWN FROM FEBRUARY TO JULY 2020 AND CLAIMANTS INDIVIDUAL CELL BLOCK WAS LOCKED DOWN FROM JANUARY TO JULY 2020. TEXAS INMATES ARE NOT SOLD TELEVISIONS AND CELLS HAD NO ACCESS TO TELEVISIONS DURING THAT TIME FRAME.

EVEN WHEN IT IS NOT LOCKDOWN HERE IN TEXAS THERE ARE ONLY TWO TELEVISIONS IN THE DAY ROOMS AND THEY ARE ALMOST ALWAYS ON SPORTS.

PRAYER

CLAIMANT NOT ONLY LOST HIS LIFE FROM THESE DRUGS, WHEN HIS SON BECAME ADDICTED TO OXYCOTIN AND COULD NOT GET IT HE TURNED TO THE STREETS AND DIED OF HEROIN OVERDOSE.

CLAIMANT DID NOT FILE ON HIS SONS BEHALF BECAUSE HE CANNOT OBTAIN THE MEDICAL RECORDS AT THIS TIME. CLAIMANT HAS THREE GRANDCHILDREN NOW WITH NO FATHER. FINALLY CLAIMANT SWEARS THAT THROUGH NO FAULT OF HIS OWN WAS HE LATE IN FILING, AND HE FILED THE CLAIM AS SOON AS HE WAS MADE AWARE OF THE SUIT AND DID ATTACH AN EXPLANATION ASKING FOR ALLOWANCE OF THE LATE CLAIM BUT AGAIN SENT THIS TO THE PRIME CLERK THINKING THIS WAS THE CLERK OF COURT.

SO FOR THE COURTS ATTENTION THIS CLAIM WAS FILED SEPTEMBER 3 2020 AND THIS LATE MOTION FOR LEAVE IS FOR THAT CLAIM .

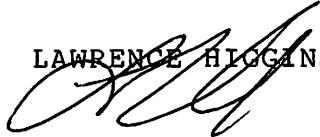
SWORN TO THIS 9th DAY OF AUGUST 2021

LAWRENCE HIGGINS

NOTICE TO COURT

THIS CLAIMANT W<sup>h</sup>IS MADE AWARE OF THE PENDING LITIGATION  
OF PURDUE PHARMA MID JULY, 2020 BY THE ADVISEMENT OF  
ANOTHER DRUG ADDICT INMATE WHO IS HOUSED IN THE DORMATORIES  
OF THE PRISON WHOM IS ALSO INVOLVED IN THIS LITIGATION.  
THIS CLAIMANT S CELL BLOCK AND DORMATORIES ARE SEPERATE  
WITH NO CONTACT TO EACH OTHER DURING LOCKDOWN FOR COVID  
19 OR ANY LOCKDOWN. THIS OTHER DRUG ADDICT INMATE  
WILL PROVIDE SWORN AFFIDAVIT IF THE COURT REQUIRES.  
CLAIMANT SWEARS UNDER THE PENALTY OF PERJURY THAT ALL  
CONTAINED IN THIS NOTICE IS TRUE AND CORRECT.  
SIGNED THIS 9TH DAY of AUGUST, 2021

LAWRENCE HIGGINS

A handwritten signature in black ink, appearing to read 'LH', is written over the printed name 'LAWRENCE HIGGINS'.

Certificate of Service.

• No Pursue.

I, The undersigned hereby certify that a  
True & correct copy of Brief in support of  
Late Filed claim was served on all parties  
By mailing same USPS 8-9-21

